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ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS <b>FILED</b> DEC 27 2007 CLERK, U.S. DISTRICT COURT By _____ Deputy
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RUTH LENTZ, Individually and On Behalf of	)	CIVIL ACTION NO. 3:05-CV-0100-D
All Others Similarly Situated,	)	(Consolidated with
	)	Civil Action No. 3:05-CV-0142-D
Plaintiff,	)	Civil Action No. 3:05-CV-0157-D
	)	Civil Action No. 3:05-CV-0184-D
- vs. -	)	Civil Action No. 3:05-CV-0203-D
	)	Civil Action No. 3:05-CV-2097-D
CITADEL SECURITY SOFTWARE INC., et	)	and
al.	)	Civil Action No. 3:05-CV-0488-D)
	)	
Defendants.	)	
----- x	)	

**MOTION OF LEAD PLAINTIFF FOR AN ORDER  
AUTHORIZING DISTRIBUTION OF NET SETTLEMENT FUND,  
INCLUSION OF LATE CLAIMS, PAYMENT OF FEES  
AND EXPENSES FOR CLAIMS ADMINISTRATION  
AND DONATION OF ANY RESIDUAL BALANCE**

Plaintiff Citadel Investors Group (consisting of Timothy M. Turose and Elaine Turose, Lee Waters, and Howard Dayton) hereby moves this Court for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure: (a) authorizing the distribution of the Net Settlement Fund to Authorized Claimants, including certain late claimants, in accordance with the recommendation of the Claims Administrator; (b) authorizing the Claims Administrator to deem as timely otherwise eligible claims that were submitted with postmarks later than the January 4, 2007 deadline and directing that no claims received after November 9, 2007 be accepted; (c) authorizing the payment of fees and the reimbursement of expenses to the Claims Administrator in the amount of \$103,894.01, for its work in providing notice to the Class and administering the claims process, including estimated fees and expenses to be incurred in connection with the

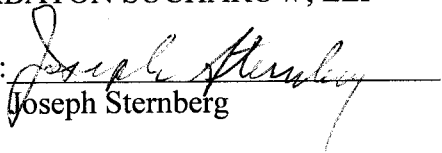
preparation and mailing of checks to the Authorized Claimants; and (d) authorizing the donation of any residual, unclaimed balance of the Net Settlement Fund to the Institute for Law and Economic Policy, a private, non-sectarian, not-for-profit corporation with Internal Revenue Code §501 (c) (3) tax deductible status. Submitted in support of the motion is an Appendix containing the declaration of Joseph Sternberg with annexed exhibit, the affidavit of Paul Mulholland, sworn to November 9, 2007, with exhibits annexed thereto, and the accompanying Lead Plaintiff's Brief in Support of Motion to Authorize Distribution of Net Settlement Fund, Inclusion of Late Claims, Payment of Fees and Expenses for Claims Administration, and Donation of Any Residual Balance.

Dated: December 18, 2007

Respectfully submitted,

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